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**Before the Federal Communications Commission
445 12 Street, S.W.
Washington, DC 20554**

In the Matter of Promoting Investment in the 3550-3700 MHz Band; GN Docket No. 17-258

Petitions for Rulemaking Regarding the Citizens Broadband Radio Service

RM-11788(Terminated)

RM-11789 (Terminated)

To the Commission:

I am writing to you on behalf of ZipLink Systems LLC. We are a small wireless ISP startup that was born from the lack of choices for internet service where we live and work. As you undoubtedly have received a lot of feedback regarding CBRS, I will keep my comments brief.

I have read a lot of the other comments and echo the arguments made in support of retaining the existing rules regarding CBRS auctions. In my view, the solution to expanding access to broadband is to create a regulatory climate that is conducive to competition. Expanding tracts and terms only helps the incumbent providers and would create an enormous financial barrier to smaller operators who are servicing areas these providers have largely ignored.

As a 3.65 license holder, we have been holding off on investing in equipment that operates in the CBRS band because of the uncertainty this filing has introduced. The large operators already have a significant advantage in licensed spectrum and approving the proposed changes to the CBRS auctions will only serve to further entrench them at the expense of rural citizens who are often left without options. Unlicensed bands are getting more and more crowded and our industry desperately needs affordable spectrum to continue to innovate and bring service to the unserved and underserved.

Thank you for your time and please keep the auction rules as they are. They are very fair and give us little guys an opportunity to be part of the solution.

Sincerely,
David Busch
CEO
ZipLink Systems LLC